

**EXHIBIT "A"**

1 KENNER LAW FIRM, P.C.  
David E. Kenner, SBN 41425  
2 Brett A. Greenfield, SBN 217343  
16000 Ventura Boulevard, PH 1208  
3 Encino, CA 91364  
818 995 1195  
4 818 475 5369 - fax

5 WADE, KELLY & SULLIVAN  
733 W. 4<sup>th</sup> Avenue, Suite 200  
6 Anchorage, Alaska 99501  
(907) 561-7743  
7 (907) 562-8977 - fax  
Attorney for Defendant Josef F. Boehm

8  
9 IN THE UNITED STATES DISTRICT COURT  
10 DISTRICT OF ALASKA

11 Sally C. Purser, )  
12 Plaintiff, ) DEFENDANT JOSEF BOEHM'S SECOND  
13 v. ) SET OF DISCOVERY REQUESTS TO  
14 Josef F. Boehm, Allen K. ) PLAINTIFF  
15 Bolling, and Bambi Tyree, )  
16 Defendants. )  
17 )  
18 ) CASE NO.: A05-0085 (JKS)

19 DEFENDANT'S SECOND SET OF DISCOVERY REQUESTS

20 Pursuant to Federal Rules of Civil Procedure 26 and 36, the  
21 Plaintiff requests that Defendant Boehm answer the attached  
22 interrogatories in writing and under oath within thirty (30) days  
23 from the date of service. Pursuant to Federal Rules of Civil  
24 Procedure 26(c) you are requested to supplement your answers if you  
25 become aware that the answers given are incorrect, misleading or  
26 incomplete.

DEFINITIONS

Unless the question conclusively indicates otherwise, the following definitions apply to the words used in these interrogatories:

A. Person: The term "person" includes a corporation, partnership, other business association or entity, a natural person, and any government or government body, commission, board, or agency;

B. Document: The term "document" is defined to mean and include any and all graphic or physical representations, including without limitation all handwritten, typed or printed material, photographs, copies of all the foregoing, and material stored on tape or any other magnetic medium;

C. Identification of Documents: When you are requested to "identify" a document, you are requested to provide the following with regard to each document:

(1) A description of the document with sufficient particularity to enable the custodian of the document to respond to a request for production or subpoena duces tecum for the document;

(2) The name, business address, residence address, telephone number, and occupation of each person who prepared or signed the document.

D. Identification of Natural Person: When you are requested to "identify" a natural person, you are requested to provide the following with regard to each such person:

(1) The name of the person;

- 1 (2) The business address of the person
- 2 (3) The residence of the person;
- 3 (4) The business telephone number of the person;
- 4 (5) The residence telephone number of the person;
- 5 (6) The occupation of the person and the name of the
- 6 employer of the person, if any.

7 E. "You" or "Your" means Sally Purser

8 INTERROGATORIES

- 9 1. As to each person identified in your Final Witness List,
- 10 describe in detail, including, but not limited to the following:
- 11 a. How you first met;
  - 12 b. When you first met;
  - 13 c. Who introduced you;
  - 14 d. Where you first met;
  - 15 e. The nature of your relationship, how long it lasted,
  - 16 and why it ended;
  - 17 f. That person's knowledge of your alleged sexual contact
  - 18 with Defendant Boehm;
  - 19 g. That person's knowledge of your alleged drug use with
  - 20 Defendant Boehm;
  - 21 h. That person's facilitating or involvement with the
  - 22 activities described in subsection (f);
  - 23 i. That Person's facilitating or involvement with the
  - 24 activities described in subsection (g).

- 19 2. Identify each and every academic institution you attended,
- 20 including but not limited to the following:

- 21 a. Name;
- 22 b. Address;
- 23 c. Phone number;
- 24 d. Dates attended;
- 25 e. Reason for leaving the institution;
- 26 f. Highest grade level completed;
- 27 g. Course of studies at each academic institution;
- 28 h. Suspensions from each academic institutions;
- i. Expulsions from each academic institution;
- j. Activities leading to a suspension at each institution;
- k. Activities leading to an expulsion at each institution.

1 3. Identify all of your criminal convictions in detail as  
2 follows:

- 3 a. date of arrest;  
4 b. arresting agency;  
5 c. initial charges filed against you;  
6 d. charges you were convicted of;  
7 e. sentencing requirements for each conviction;  
8 f. probation requirements for each conviction.

7 4. Identify each and every drug rehabilitation facility you  
8 have attended, including, but not limited to:

- 9 a. Name;  
10 b. address;  
11 c. phone number;  
12 d. dates attended;  
13 e. Reason for leaving;  
14 f. certificates earned;  
15 g. evaluations completed.

13 5. Identify each and every prescription drug prescribed to  
14 you, including but not limited to:

- 15 a. Name of drug;  
16 b. Date of prescription;  
17 c. Treating physician;  
18 d. Address of treating physician who prescribed  
19 medication;  
20 e. Phone number of treating physician who prescribed  
21 medication;  
22 f. Physical or mental ailment requiring each  
23 prescription.

21 6. Is your response to each Request for Admission served with  
22 these interrogatories an unqualified admission? If not, for each  
23 response that is not an unqualified admission:

- 24 a. State the number of the request;  
25 b. State all facts upon which you base your response;  
26 c. State the names, addresses, and telephone numbers of  
27 all persons who have knowledge of those facts;  
28 d. Identify all documents and other tangible things that  
support your response and state the name, address and  
telephone number of the person who has each document  
or thing.

REQUESTS FOR ADMISSION

1. Admit you smoked marijuana before initially meeting Defendant Boehm;
2. Admit you smoked marijuana with your mother Kathleen Purser before initially meeting Defendant Boehm;
3. Admit you snorted cocain before initially meeting Defendant Boehm;
4. Admit you snorted cocain with your mother Kathleen Purser before initially meeting Defendant Boehm;
5. Admit that you viewed your father being violent towards your mother on several occasions;
6. Admit you engaged in sexual intercourse and/or oral sex with individuals other than Defendants Boehm, Bolling or Williams before the age of eighteen years old;;
7. Admit that you smoked "crack" cocain before initially meeting Defendant Boehm;
8. Admit that you smoked "crack" cocain with your mother Kathleen Purser before initially meeting defendant Boehm;
9. Admit that you drank alcohol before initially meeting Defendant Boehm;

1 10. Admit that you drank alcohol with your mother Kathleen Purser  
2 before initially meeting Defendant Boehm;

3  
4 11. Admit that your mother Kathleen Purser physically assaulted you  
5 on more than one occasion;

6  
7 12. Admit that drug addiction is prevalent in your family;

8  
9 13. Admit that You were sexually abused by your uncle;

10  
11 15. Admit you were expelled from an academic institution for drug  
12 sales;

13  
14 16. Admit you worked as a prostitute on Chuchach Drive, also known  
15 as "the track";

16  
17 17. Admit you engaged in sexual intercourse and/or oral sex with  
18 individuals other than Defendant Boehm, Bolling or Williams  
19 before the age of sixteen years old;

20  
21 18. Admit that you assisted in the day to day operations of an  
22 escort service for Jay Whaley;

23  
24 19. Admit that you sold drugs for Jay Whaley;

25  
26 20. Admit that you had sexual relations with Jay Whaley before the  
27 age of eighteen;

28

- 1 21. Admit that you were involved in a conspiracy to keep Defendant  
2 Boehm high on drugs in order to steal money from him;  
3
- 4 22. Admit that you have stated that Defendant Boehm was a victim of  
5 Bambi Tyree, Leslie Williams and Allen Bolling;  
6
- 7 23. Admit that your mother Kathleen Purser sold you for "crack  
8 cocain";  
9
- 10 24. Admit that you traded sexual favors with individuals in  
11 exchange for money and drugs other than the alleged occurrences  
12 defendants Bolling, Williams and Boehm;  
13
- 14 25. Admit that you traded sexual favors for money and drugs with  
15 Carl Bucher before initially meeting Defendant Boehm;  
16
- 17 26. Admit that defendants Tyree, Williams and Bolling laced  
18 defendant Boehm's drugs and food with a foreign substance in  
19 order keep him "High" and steal his money;  
20
- 21 27. Admit that you worked as a prostitute at the direction of Jay  
22 Whaley.  
23
- 24 28. Admit that Defendant Boehm is not the cause of your drug abuse  
25 history;  
26  
27  
28



1 29. Admit that Defendant Boehm is not the cause of your history of  
2 engaging in prostitution;

3  
4 30. Admit that Defendant Boehm is not the cause of your history of  
5 engaging in drug sales.

6  
7 Dated: November 10, 2006

KENNER LAW FIRM, P.C.

8  
9 By: 

10 David E. Kenner  
11 Attorney for Defendant  
12 Josef F. Boehm  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 INTERROGATORY VERIFICATION

2 STATE OF ALASKA

3 THIRD JUDICIAL DISTRICT

4 Sally Purser, being first duly sworn, upon oath, deposes and  
states:

5 I am the plaintiff in the above-entitled action; that I have  
6 read the responses to the Interrogatories and believe them to be  
true and correct to my knowledge and belief.

7

8

Sally Purser

9

10

11 SUBSCRIBED AND SWORN TO before me this \_\_\_\_\_ day of December,  
12 2006.

13

14

15

16

NOTARY PUBLIC in and for Alaska.

17

My Commission Expires: \_\_\_\_\_

18

19

20

21

22

23

24

25

26

27

28

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10<sup>th</sup> day of November, 2006. I caused a true and correct copy of the foregoing **DEFENDANT'S SECOND SET OF DISCOVERY TO PLAINTIFF PURSER** The following parties were served via U.S. Mail on November 10, 2006:

Pamela Sullivan, Esq.  
733 West 4<sup>th</sup> Street  
Suite 200  
Anchorage, AK 99501

Allen K. Bolling  
Inmate No: 14911-006  
USP Terre Haute  
U.S. Penitentiary  
P.O. Box 12015  
Terre Haute, IN 47801

Josef Boehm  
Reg. # 14887-006  
P.O. Box 5300  
Adelanto, CA 92301

Bambi Tyree  
c/o Mary Pate, Esq.  
425 G. Street, Suite 930  
Anchorage, Alaska 99501

Leslie Williams  
Inmate No: 14903-006  
FCI Yazoo City Medium  
P.O. Box 5888  
Yazoo City, MS 39194

Dated: November 10, 2006

  
Rosie Ruiz

DEFENDANT'S SECOND SET OF DISCOVERY TO PLAINTIFF PURSER